

EXHIBIT 30

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1 PRESENT:

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21 ALSO PRESENT:

22 KIM VAN VOORHIS,
23 Nike, Inc.

24

25 VIDEOGRAPHER: Milo Savich
26 STENOGRAPHICALLY REPORTED BY:
27 JO ANN LOSOYA, CSR, RPR, CRR
28 LICENSE #: 084-002437

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1 looking through that, and again, none of those are
2 actually authentication, because the brand is the
3 only one that can authenticate a product that is
4 produced by them.

5 Q. Generally speaking, if counterfeiters
6 inundate platforms and some counterfeits still get
7 through the platform, does that necessarily mean
8 that the platform's anti-counterfeiting measures are
9 not beneficial in any way?

10 A. So I don't know if I can speak to that
11 general statement.

12 Again, it would depend on the
13 platform, it would depend on what they're selling,
14 it would depend on, you know, what efforts they've
15 decided to pursue in response to
16 anti-counterfeiting. A lot of -- a lot of factors
17 in there that would have to be considered.

18 Q. So you can't say that stopping some
19 counterfeits is beneficial, correct?

20 A. No. I don't believe that's what I said.

21 Q. Let me ask you then. Can you say -- is
22 stopping counterfeits, regardless of the amount you
23 stop, beneficial?

24 MS. DUVDEVANI: Objection.

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1 BY THE WITNESS:

2 A. So my entire life's work is around right
3 now anti-counterfeiting. So if there's any -- if
4 there's any opportunity for someone to remove a
5 potential counterfeit good from the stream of
6 commerce, whether that's someone enforcing on Canal
7 Street, or a brand owner submitting for a notice and
8 take down or a law enforcement agent following up,
9 yes, the goal of all of brand protection and
10 anti-counterfeiting is to remove counterfeit --
11 counterfeit listings or counterfeit products,
12 depending on whether it's brick and mortar or any
13 e-commerce.

14 Q. If a platform's anti-counterfeiting
15 measures still inadvertently allow some counterfeits
16 through, does that necessarily mean that the
17 platform is not trying to prevent the sale of
18 counterfeits?

19 MS. DUVDEVANI: Objection.

20 BY THE WITNESS:

21 A. Again, I can't speak to whether a
22 platform is trying or not.

23 Q. You can't speak to whether the platform
24 is not trying or not?

25 A. Correct.

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1 Q. Would you agree that no
2 anti-counterfeiting program is perfect?

3 A. Specifically what do you mean by perfect?

4 Q. Would you agree that no
5 anti-counterfeiting program is able to eliminate the
6 threat of counterfeits?

7 A. Correct. So no -- I would agree with
8 that that no anti-counterfeiting program is able
9 to -- and if you are talking in the context of
10 platforms, is able to entirely -- entirely eliminate
11 counterfeiting, which is why e-commerce platforms
12 that allow third party sellers are so risky because
13 of that and also why it was surprising for me that
14 StockX had claimed to essentially make sure almost
15 100 percent of their products were authentic and
16 they essentially eliminated counterfeiting in their
17 marketplace.

18 Q. Do you know of any platforms that aren't
19 inundated with counterfeits?

20 MS. DUVDEVANI: Objection.

21 BY THE WITNESS:

22 A. Again, I haven't spoken to other
23 platforms specifically on levels of inundation by
24 similar sellers. We know that counterfeiting is
25 increasing exponentially, particularly since the